

Exhibit F

MARCO ANTONIO CARRION
JARRETT PAYNE vs MAYOR BILL DE BLASIO

April 20, 2023

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4
5 JARRETT PAYNE, et al.,

6 Plaintiffs,

7 v. Case No.
8 1:20-cv-08924

9 MAYOR BILL DE BLASIO

10 et al.,

11 Defendants.

12 REMOTE DEPOSITION OF MARCO ANTONIO CARRION

13 April 20, 2023

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22 Stenographically Reported by:
23 Bonnie Pruszynski, RMR, CA CSR No. 13064
Job No. J9519203

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April 20, 2023

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10:00 a.m.

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REMOTE DEPOSITION OF MARCO

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ANTONIO CARRION, before Bonnie Pruszynski, CA

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Certified Shorthand Reporter No. 13064, a

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Registered Merit Reporter, Certified Livenote

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Reporter, and Notary Public of the States of New

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York and Florida.

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1 APPEARANCES:

4 New York Civil Liberties Union

5 Attorneys for PlaintiffS

6 125 Broad Street, 19th Floor,

7 New York, New York 10004

8 BY: Molly Biklen, Esq.

9 Bobby Hodgson, Esq.

10 Alicia Wagner Calzada, PLLC

11 Attorneys for the Gray plaintiffs, National Press

12 Photographers Association:

13 806 Patricia

14 San Antonio, TX 78216

15 BY: Alicia Calzada, Esq.

16 Attorney General of the State of New York

17 for the People of the State of New York

18 28 Liberty Street

19 New York, New York 10005-1400

20 BY: Lillian M. Marquez, Esq.

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2 REMOTE APPEARANCES (Continued) :

3
4 New York City Law Department

5 Attorneys for the New York City defendants

6 100 Church Street

7 New York, New York 10007

8 By: Thomas Dean, Esq.

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1 M. Carrion

2 MARCO ANTONIO CARRION,

3 called as a witness, having been first
4 duly sworn, was examined and testified
5 as follows:

11:48

6 EXAMINATION

7 BY MS. BIKLEN:

8 Q. Good morning, Mr. Carrion. If you
9 could say your full name for the record,
10 please.

10:03

11 A. Sure. Marco Antonio Carrion.

12 Q. Good morning, Mr. Carrion. My name
13 is Molly Biklen, and I'm an attorney with the
14 New York Civil Liberties Union, and I
15 represent the plaintiffs in the case. Today
16 I will be asking you some questions regarding
17 the protests that occurred starting in the
18 spring and summer of 2020.

10:03

19 Before we get started, have you
20 ever been deposed before?

10:03

21 A. Yes.

22 Q. Okay. About how many times?

23 A. One other time.

24 Q. And was that a civil case?

25 A. Yes.

10:04

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1 M. Carrion
2 able to predict, so -- but, you know, there
3 was no inciting of violence that I saw.

4 MR. DEAN: Let me just ask you, are
5 you getting fatigued? I'm just judging
6 just based on your voice.

9 MR. DEAN: Okay.

10 THE WITNESS: Just have to go back
11 in time in my mind.

12 MR. DEAN: Okay.

13 Q. What time did you get to the
14 protest in the Bronx on June 4th?

15 A. Before -- I could not tell you
16 time. It was before the -- before the crowd
17 started to move.

18 Q. So, during the sort of rally
19 portion?

20 A. Yes. I was at the rally.

21 Q. And you're familiar with that area
22 of the Bronx?

23 A. I am.

24 Q. Do you recall anything about the --
25 about the rally?

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1 M. Carrion
2 whether individuals serving as protest medics
3 were exempt from the curfew?

4 A. I don't think I actually thought
5 about that, so I didn't have an understanding
6 that they were exempt. I don't think the
7 thought crossed my mind.

16:05

8 Q. So, you didn't have any discussions
9 with anyone in the Mayor's office about
10 whether medics serving as protest medics
11 would be exempt from the curfew?

16:06

12 A. No.

13 Q. So, after the march left the plaza
14 down Willis Avenue, you followed it toward
15 the end?

16:06

16 A. I was at the end of the march. I
17 followed it down Willis Avenue until we got
18 to the 40th, which is -- the march continued,
19 turned. I stopped. I snapped some photos,
20 and I tried to figure out what was going on
21 at the precinct.

16:06

22 Q. Prior to stopping at the 40th
23 precinct, you were with the protest march the
24 whole time?

16:07



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1 M. Carrion

2 Q. From when you left the plaza?

3 A. Yes.

4 Q. From what you saw of the rally, did
5 you have any reason to believe it would lead
6 to the kind of looting that had been seen on
7 Fordham Road a few days earlier? 16:07

8 MR. DEAN: Objection to form.

9 A. No. I had no reason to believe it
10 would lead to any type of looting. 16:07

11 Q. As the march was proceeding from
12 the plaza, did police officers accompany the
13 march?

14 A. Yes.

15 Q. About how many? 16:07

16 A. I don't recall.

17 Q. Would you characterize what you saw
18 of the march as orderly?

19 A. Yes.

20 Q. Now, you said that you made it back
21 to the march after arrests were already being
22 made? 16:08

23 A. Yes.

24 Q. About what time was that?

25 A. I don't know. I wasn't watching, 16:08